

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SAMUEL KATZ, an individual, on his
own behalf and on behalf of all others
similarly situated,
Plaintiff,

v.

LIBERTY POWER CORP., LLC, *et al.*,
Defendants.

Case No. 1:18-cv-10506-ADB

DECLARATION OF JEFFREY BRUNDAGE

I, Jeffrey Brundage, upon my own personal knowledge, under oath hereby depose and state as follows:

1. I am over the age of 18 years old and otherwise competent to testify.
2. I am an attorney with the law firm of Eckert Seamans Cherin & Mellott, who represents the Defendants in the above-captioned matter.
3. **Exhibit B** is a true and accurate copy of the response to a subpoena I sent to Bandwidth CLEC, LLC, with highlights added. At the time of the alleged telephone calls in paragraph 50 of the Complaint, the alleged calling telephone number (508) 202-1270 was on the Bandwidth CLEC, LLC network, a VoIP provider.
4. In his First Amended FED. R. CIV. P. 26(A)(1) disclosures, Plaintiff disclosed Verizon FIOS as his telephone number carrier.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 25, 2018


Jeffrey Brundage